

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Francis Rayner : Chapter 13  
Terri Rayner,  
Debtors : No: 19-14659

DEBTOS' RESPONSE TO STANDING TRUSTEE'S AMENDED MOTION FOR DISMISSAL

And Now, comes Francis and Terri Rayner, debtors, by and through their undersigned counsel,

Michael T. Malarick, Esq., and requests that the within motion be denied, and in support thereof avers:

1. Debtors have provided evidence of Business Insurance coverage.
2. Debtors have commenced and can continue to make payments to the trustee. Specifically, debtors state that they can make two payments on January 30, 2020 in as much they needed to rent a vehicle for the debtors to get to their various jobs. See attached email.
3. Debtors have applied for a loan modification from the mortgage servicer, and, due to their increased income, understand that the application is pending final approval.

WHEREFORE, debtors, Francis and Terri Rayner, respectfully request that the within motion be denied.

Respectfully submitted,



Michael T. Malarick, Esq.  
Attorney for Debtors  
2211 Chichester Ave., Suite 201  
Boothwyn, PA 19061

## Michael Malarick

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**From:** TheCrayner1 . <cprayner@gmail.com> on behalf of TheCrayner1 .  
**Sent:** Sunday, January 19, 2020 3:58 PM  
**To:** Michael Malarick  
**Subject:** Re: Trustee Payment

Hi Michael,

We won't be able to make a payment until the 30th of January. As I mentioned, since our car was repossessed, we had to pay for a rental which was expensive, but we needed to get to work. I don't know what else to say, but we just don't have fourteen hundred dollars to give them by Wednesday. Why do we need this if the mortgage company is going to approve us for the loan modification? Please advise the trustee this is another reason why we didn't make any recent payments. I'm sorry, there is just no way we can come up with two payments now.

Sincerely,

Francis and Terri Rayner

On Sun, Jan 19, 2020, 2:55 PM Michael Malarick <[michael@malaricklaw.com](mailto:michael@malaricklaw.com)> wrote:

Francis,

You will have to make at least 2 months trustee payments this week.

Can you send me a copy of the certified check or money order that you mail out before Wednesday so that I can show it to the judge.

Sincerely,

Michael T. Malarick, Esq.

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Boothwyn, PA 19061

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